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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA) Criminal Case No.08cr0545LAB
12 Plaintiff)
13 v.)
14 MARICELA GONZALEZ-TREJO (1)) NOTICE OF MOTION; MOTION FOR
15 MIGUEL ROMERO-RIOS (2)) VIDEOTAPE DEPOSITIONS,
16 Defendants) AND RELEASE OF MATERIAL
17) WITNESSES;
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Hearing Date: April 15, 2008
Time: 1:30 p.m.
Court: A
Judge: Hon. Anthony J. Battaglia

19 TO KAREN P. HEWITT, UNITED STATES ATTORNEY, CARLOS ARGUELLO,
20 ASSISTANT UNITED STATES ATTORNEY, TIMOTHY SCOTT, ATTORNEY FOR
21 DEFENDANT, MARICELA GONZALEZ-TREJO, AND MICHELLE BETANCOURT,
22 ATTORNEY FOR DEFENDANT, MIGUEL ROMERO RIOS.

23 PLEASE TAKE NOTICE that on April 15, 2008, at 1:30 P.m., counsel will move this
24 court for an order to take the depositions of the material witnesses, LUIS ALBERTO OCHOA-
25 CASTILLO, and G.C-G.(minor)

MOTION

1 LUIS ALBERTO OCHOA-CASTILLO, and G.C-G.(minor), through thier counsel,
2 CIRO HERNANDEZ, and pursuant to Fed. R. Crim. P. Rule 15, 8 U.S.C Section 1324 (d) , 18
3 U.S.C. Section 3144, and 18 U.S.C. Section 3142, hereby moves this court for an order to take
4 their depositions by videotape.

5 This motion is based upon the accompanying points and authorities, the records in the
6 above-entitled case and all matters submitted to the court prior to the determination of this
7 motion.

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9 Dated: March 25, 2008

/S/ Ciro Hernandez
10 CIRO HERNANDEZ
11 Attorney for material witnesses

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